

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-CR-80219-CANNON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL DOUGLAS,

Defendant.

UNOPPOSED MOTION TO EXTEND DEADLINES
FOR PSR OBJECTOINS

COMES NOW, the Defendant, MICHAEL DOUGLAS, by and through the undersigned counsel, requests this Court extend the deadline to file PSR objections. As grounds, he states:

1. The Court scheduled this case for a sentencing hearing on August 25, 2025. [DE 166].
2. On July 21, 2025, probation docketed its Draft PSR. [DE 182]. As such, objections to the PSR are due August 4, 2025.
3. Undersigned counsel was on leave from July 21 through July 25 and will be out again from July 31-August 4.
4. Accordingly, undersigned counsel requests this Court extend the deadline to file PSR objections one week, until August 11, 2025, to provide him adequate time to consider and prepare any such objections.

5. AUSA Adam McMichael does not object to this motion.

WHEREFORE Defendant respectfully requests the Court to grant the above-styled motion.

Respectfully submitted,

HECTOR DOPICO
FEDERAL PUBLIC DEFENDER

s/ Scott Berry
Scott Berry
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CERTIFICATE OF SERVICE

I HEREBY certify that on July 29, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Scott Berry
Scott Berry